

EXHIBIT C

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC., PASSENGER SEXUAL ASSAULT LITIGATION Case No. 3:23-md-03084 CRB

This Document Relates to:

ALL ACTIONS

VIDEO DEPOSITION OF UBER TECHNOLOGIES, INC.'S
30(b)(6) CORPORATE REPRESENTATIVE - ELIZABETH ROSS
San Francisco, California
Wednesday, June 11, 2025

Volume 1

STENOGRAPHICALLY REPORTED BY:
REBECCA L. ROMANO, RPR, CSR, CCR
California CSR No. 12546
Nevada CCR No. 827
Oregon CSR No. 20-0466
Washington CCR No. 3491

JOB NO. 6899600-001

PAGES 1 - 344

1 (Video playing.)

2 Q. (By Ms. Walsh) Okay. Let me ask you
3 this first: Do you think that that rider was --
4 that someone watching that would think, Okay. This
5 person is supposed to seem like they're kind of
6 inebriated after drinking on New Year's Eve?

7 A. Yeah, I think someone could watch that
8 and assume that that person might have had a few
9 drinks --

10 Q. Okay.

11 A. -- during their New Year's party, yes.

12 Q. Okay. And -- and that is something that
13 Uber was comfortable marketing itself as -- strike
14 that.

15 That was something that Uber was
16 comfortable portraying in its -- in its marketing,
17 that getting in an Uber and taking an Uber after
18 you've had some drinks out celebrating is an okay
19 thing to do?

20 A. Yes, and it's done in collaboration with
21 MADD.

22 Q. Okay.

23 A. Which I can explain who MADD is. But
24 MADD is Mothers Against Drunk Driving. And so it's
25 an ad campaign that's done in partnership with them

1 to drive awareness of making sure people don't get
2 behind the wheel when they're drinking.

3 Q. Okay. And just focus on my question for
4 now. We can talk about MADD if you want.

5 But am I correct that Uber was
6 comfortable communicating to people through its
7 marketing that having some drinks and getting in an
8 Uber is a safe thing to do?

9 A. Yes, I think with this campaign, we are
10 showing people that are drinking and using Uber.
11 But I do not think that we're showing them drinking
12 to excess. But, yes, we are showing them drinking.

13 Q. Okay. Does -- are you aware in any of
14 the marketing materials that you've look at that
15 say, You shouldn't use Uber if you've been drinking
16 to excess?

17 A. Not that I'm aware of off the top of my
18 head, no.

19 Q. Okay. And you understand that that could
20 be a pretty risky thing to do?

21 MS. LEVY: Object to form, and
22 foundation.

23 THE DEPONENT: Can you clarify.

24 Q. (By Ms. Walsh) Well, Uber has its own
25 analysis and its own data that has led it to

1 I, Rebecca L. Romano, a Registered
2 Professional Reporter, Certified Shorthand
3 Reporter, Certified Court Reporter, do hereby
4 certify:

5 That the foregoing proceedings were taken
6 before me at the time and place herein set forth;
7 that any deponents in the foregoing proceedings,
8 prior to testifying, were administered an oath;
9 that a record of the proceedings was made
10 stenographically by me and which was thereafter
11 transcribed under my direction; that the foregoing
12 transcript is a true record of the testimony given.

13 Further, that if the foregoing pertains to the
14 original transcript of a deposition in a Federal
15 Case, before completion of the proceedings, review
16 of the transcript [] was [X] was not requested.

17 I further certify I am neither financially
18 interested in the action nor a relative or employee
19 of any attorney or any party to this action.

20 IN WITNESS WHEREOF, I have this date
21 subscribed my name.

22

23 Dated: June 13th, 2025

24



Rebecca L. Romano, RPR, CCR
CSR. No 12546

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, Case No. 3:23-md-03084
INC., PASSENGER SEXUAL CRB
ASSAULT LITIGATION

This Document Relates to:

ALL ACTIONS

VIDEO DEPOSITION OF UBER TECHNOLOGIES, INC.'S
30(b)(6) CORPORATE REPRESENTATIVE - ELIZABETH ROSS

San Francisco, California

Thursday, June 12, 2025

Volume 2

STENOGRAPHICALLY REPORTED BY:
REBECCA L. ROMANO, RPR, CSR, CCR
California CSR No. 12546
Nevada CCR No. 827
Oregon CSR No. 20-0466
Washington CCR No. 3491

JOB NO. 6899605-001

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1 A. Yes.

2 Q. Okay. Ms. Ross, are you familiar with a
3 marketing -- well, Uber has a YouTube channel,
4 right?

5 A. Yes, we do.

6 Q. Okay. And Uber's YouTube channel is
7 another way that Uber communicates with riders,
8 right?

9 A. Yes.

10 Q. And markets -- tries to sell more rides
11 by having people look at its YouTube channel,
12 right?

13 A. Yeah, we use it as an opportunity to
14 visually explain products or features or show
15 campaigns and ads, yes.

16 Q. Okay. And one thing that Uber has done
17 on its YouTube channel is encourage people after
18 they've been drinking to take Uber?

19 A. I'm -- I don't -- not that I'm aware of.
20 But there could be videos, like I've
21 said, where we've done in partnership with MADD,
22 Mothers Against Drunk Driving, where we talk about
23 Uber being an option for people to take when
24 they've been out drinking.

25 Q. Okay. You've mentioned several times

1 the -- that you've done campaigns in connection
2 with MADD, Mothers Against Drunk Driving, right?

3 A. Yes.

4 Not me specifically, but, yes, the
5 marketing team.

6 Q. That Uber has, right?

7 A. Yes.

8 Q. Uber also does marketing campaigns with
9 beer companies, right?

10 A. Yes, we have partnered in a three-way
11 partnership with Mothers Against Drunk Driving and
12 Anheuser-Busch.

13 Q. Okay. Anheuser-Busch, which sells
14 Budweiser beer, right?

15 A. Yes.

16 Q. Okay. So it's not just Mothers Against
17 Driving [sic]; it's also these alcohol companies
18 that you all work with to market your services,
19 right?

20 A. Yeah.

21 We work with Mothers Against Drunk
22 Driving alongside Anheuser-Busch because they've
23 partnered together, as well, because they both want
24 to stop and end drunk driving incidents and drunk
25 driving on the road.

1 I, Rebecca L. Romano, a Registered
2 Professional Reporter, Certified Shorthand
3 Reporter, Certified Court Reporter, do hereby
4 certify:

5 That the foregoing proceedings were taken
6 before me at the time and place herein set forth;
7 that any deponents in the foregoing proceedings,
8 prior to testifying, were administered an oath;
9 that a record of the proceedings was made
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15 Case, before completion of the proceedings, review
16 of the transcript [] was [X] was not requested.

17 I further certify I am neither financially
18 interested in the action nor a relative or employee
19 of any attorney or any party to this action.

20 IN WITNESS WHEREOF, I have this date
21 subscribed my name.

22
23 Dated: June 16th, 2025

24 
Rebecca L. Romano, RPR, CCR
CSR. No 12546